

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 02-30043-MAP
)
 (1) ALEKSEI SAFANOV,)
 (2) IVAN TELEGUZ,)
 (3) ROMAN ZHIRNOV,)
 (4) ANDREY BUYNOSKIY,)
 (5) MICHAEL QUICKEL,)
 Defendants.)

Government's Motion for Order of Excludable Delay

(Assented To)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, moves for an order of excludable delay under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(8)(A) & 3161(h)(8)(B)(ii) & (iv), from June 6, 2005, to the date of the trial, November 28, 2005.

This is a complex case involving five defendants, over twenty firearms and events in at least three states. Numerous consensual recordings were made. One of the defendants, Ivan Teleguz, is incarcerated in Virginia on unrelated charges. In addition to these facts, the state of the law regarding federal sentencing has changed in recent months and the federal sentencing guidelines are now advisory.

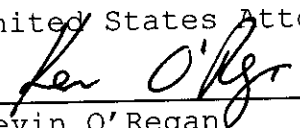
At the status conference on June 6, 2005, counsel agreed that the ends of justice served by excluding this time from the

Speedy Trial Act outweigh the best interest of the public and defendants in a speedy trial.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

by:

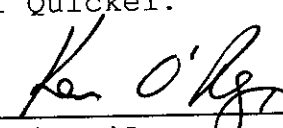

Kevin O'Regan
Assistant U.S. Attorney

Date: November 4, 2005

CERTIFICATE OF SERVICE

November 4, 2005

I certify that I have caused to be served a copy of the foregoing document on Alan Black, Esq., counsel for Aleksei Safanov, David Wenc, Esq., counsel for Ivan Teleguz, Charles J. Sclafani, Jr., Esq., counsel for Roman Zhirnov, Joseph D. Bernard, Esq., counsel for Andrey Buynovskiy, and Richard J. Maggi, Esq., counsel for Michael Quickel.


Kevin O'Regan
Assistant U.S. Attorney